



June 08, 2012

CERTIFIED MAIL

Science Applications International Corporation
18912 North Creek Parkway, #101
Bothell, Washington 98011
Attn: Ms. Iris Winstanley

Re: Saint-Gobain Containers, Inc.
Seattle, WA Facility
Stormwater Pollution Prevention Plan Update

Dear Ms. Winstanley:

Attached is the updated Stormwater Pollution Prevention (SWPPP) for Saint-Gobain Containers' Seattle Facility. You will note that the attached drawing contains a highlighted number near the top of the page. The number (002) corresponds to Outfall 002 where quarterly samples are secured. There has been no change in monitoring location since the facility obtained its permit coverage. Ecology will be notified before any change in sample location is undertaken.

Should the Washington State Department of Ecology have any questions or require additional information, please do not hesitate to contact the undersigned at (206) 768-6221.

Very truly yours,
Saint-Gobain Containers

Doug Coburn
Plant Manager

Cc: D. Coburn M. Gibbons A. Kariko
T. Thommasson V. Krulic J. Browning

9.0 STORMWATER POLLUTION PREVENTION PLAN

9.1 INTRODUCTION

As stated in Section 1.1 of this CESPP, this portion of the Plan has been developed consistent with the DOE's requirements for an SWPPP as given in the Stormwater Permit. The stormwater management practices contained in this SWPPP were developed according to the Washington State Department of Ecology Stormwater Management Manual for Western Washington (February 2005) and as required under the Modified Industrial Stormwater General Permit effective July 1, 2012; and scheduled to expire January 1, 2015.

This SWPPP will be signed in accordance with the requirements summarized in Section 9.11.

This SWPPP contains:

- Facility location and description
- Responsible signatory official
- Pollution Prevention Team
- Facility description, Site map
- Identification of industrial activity potential pollutant sources, materials inventory
- Identification of past spills and leaks
- BMPs
 - Operational BMPs
 - Source-specific structural source control BMPs
 - Treatment BMPs
- Erosion and sediment control
- Operation and maintenance
- Handling and disposal of solid and liquid wastes from the stormwater conveyance system
- Documentation regarding endangered species and historic properties
- Annual Report
- Monitoring plan

- Reporting of unauthorized releases
- Signatory requirements and revision information

9.2 STORMWATER POLLUTION PREVENTION TEAM

The Stormwater Pollution Prevention Team has the responsibility to implement measures to reduce potential contamination of stormwater and the discharge of potentially contaminated stormwater from the Facility to off-Site areas. The Stormwater Pollution Prevention Team is also responsible for assisting the Facility manager in developing, implementing, maintaining, and revising this SWPPP, and in ensuring the Facility's compliance with the SWPPP. The members of the Stormwater Pollution Prevention Team and their responsibilities are described in Table 9-1. The list should be displayed or posted within the Facility so that other employees are aware of who is responsible for stormwater management. This list should be updated as changes in team membership or responsibilities dictate.

9.3 SITE DESCRIPTION

9.3.1 DESCRIPTION OF THE FACILITY

As described in Sections 1.3 and 1.4 of the CESPP, the Facility produces glass containers in a complex located on 17 acres. There are four glass-melting furnaces fired by natural gas, fuel oil during periods of natural gas curtailment, and with electric boost.

Raw materials used to make the glass consist of sand, soda ash, limestone, and cullet (recycled glass) with small amounts of carbocite, iron pyrites, iron chromite, salt cake, powder blue, and selenium. The raw materials are distributed from the material loading area in the center of the Facility to each of the process areas. The materials are heated in the glass-melting furnaces in each process area and fed through nine glass-forming machines.

The Facility is bordered on the north and the south sides by industrial facilities and warehousing and on the west by the Duwamish River.

9.3.2 IMPERVIOUS SURFACE ESTIMATE

The impervious area of the Site is approximately 100 percent of the area of the Site.

9.3.3 PRECIPITATION INFORMATION

The average precipitation at the Site is approximately 38 inches per year, based on the precipitation data for the Seattle International Airport. Precipitation falls primarily during the period November through March.

9.3.4 STORMWATER CONVEYANCE SYSTEM

The part of the Facility located on the East Side of Ohio Avenue consists of the industrial buildings, roadways, and parking areas. This area drains to the sanitary sewer.

The part of the Facility located on the West Side of Ohio Avenue consists mainly of storage buildings, outdoor glass cullet storage areas, roadways, and parking. This area is served by a stormwater drain system.

The stormwater drain system is designed to collect stormwater from roof drains, catch basins, and underground conveyance pipes. This system discharges the stormwater to the lower Duwamish River through five outfalls as shown on Figure 3-1. According to a December 2007 Level Two Source Control Investigation prepared for Saint-Gobain, the outlets each represent approximately the following areas:

<i>Drainage Basin/Outlet Number</i>	<i>Estimated Area Represented</i>	<i>Area Features</i>
Drain 001	10%	<ul style="list-style-type: none">• Employee parking area• Entrance roadway
Drain 002	35-40%	<ul style="list-style-type: none">• Runoff from catch basins on Ohio Avenue• Parking area• Glass cullet storage area• Roof drains from industrial buildings on East part of Site• Storage buildings on West part of Site
Drain 003	20-25%	<ul style="list-style-type: none">• Roof drains of storage buildings• Paved parking areas• Roadways
Drain 004	20-25%	
Drain 005		<ul style="list-style-type: none">• Access road to North of Site• Stormwater from property located North of Site

9.3.5 MAPS

A general location map is presented on Figure 1-1. This map shows the location of the surface water bodies within 1 mile of the Site, that is, of the Duwamish Waterway which borders the Site along its southwestern boundary.

Figures 3-1 and 3-2 show:

- The boundaries of the Site
- The directions of stormwater flow
- The location of the Waterway adjacent to the Site (there are no wetlands adjacent to the Site)
- The locations of all stormwater conveyances
- The locations of stormwater inlets and outfalls and the approximate areas draining to them
- Vehicle service areas
- Potential pollutant sources

Note that the following features are not included on Figures 3-1 and 3-2:

- Areas of existing and potential soil erosion - erosion is expected to be minimal since the Site is 100 percent impervious, and the Duwamish shoreline is protected by riprap
- Industrial activities exposed to stormwater - all industrial activities are conducted indoors (see Section 4.1)
- Structural or source control BMPs (see Section 9.5)
- Significant spills or leaks (see Section 9.4.3)
- Non-stormwater discharges - there are none (see Section 9.4.3)
- Activities such as fueling, equipment maintenance, etc. that are exposed to precipitation (shown on Figure 1-2)
- Run-on to the Site from adjacent property that contains significant quantities of pollutants - there is none

9.3.6 RECEIVING WATERS AND WETLANDS

The receiving waters and wetlands are:

- Duwamish Waterway which borders the Site along its southwestern boundary

No wetlands are potentially affected by stormwater discharges from the Facility.

The Duwamish Waterway is considered to be an impaired water, however, no additional sampling requirements have been required by DOE.

9.4 SUMMARY OF POTENTIAL POLLUTANT SOURCES

9.4.1 INDUSTRIAL ACTIVITIES EXPOSED TO STORMWATER

The activities and materials at the Facility that are potentially exposed to stormwater are listed in Table 9-2. The table also shows which activities and materials are actually exposed to stormwater. Potential spillage areas are described in Section 3-2.

Potential pollution generating activities are described in more detail in Section 3-2 and include:

- Industrial process areas
- Degreasing operations
- Inventory storage areas
- Inventory usage areas
- Hazardous waste storage
- Aboveground tanks and lines

The source-specific BMPs are covered in more detail in Section 9.5.2.

There are no:

- Outdoor manufacturing or processing areas
- On-Site waste treatment, storage, or disposal

9.4.2 INVENTORY OF MATERIALS

The following materials are handled or stored at the Facility:

- Used empty containers (uncleaned)
- Machinery
- Scrap metals
- General wastes, universal wastes
- Paints
- Cullet
- Raw materials
- Diesel fuel, hydraulic and lubricating oil, and used oil ASTs

The potential pollutants from source areas or activities are described in Table 9-2.

No materials are disposed of at the Facility.

A list of significant materials handled, treated, and stored that can be exposed to stormwater or snowmelt and result in stormwater pollution of a significant amount are listed in Table 9-3 with the potential pollutants associated with the source and a summary of BMPs. The locations of these possible sources are shown on Figure 3-1. Section 9.5 provides an explanation of how the significant materials are handled, treated, or stored on Site to prevent pollution of stormwater.

9.4.3 SPILLS AND LEAKS

See Section 8.0 of the CESPP.

The description of the spills and leaks in Section 8.0 of the CESPP will be updated whenever a spill or leak takes place.

9.4.4 ELIMINATION OF UNAUTHORIZED DISCHARGES

See the Certification of Non-Stormwater Discharges in Appendix A, which certifies that all discharges have been tested or evaluated for the presence of any non-stormwater

discharge which is not authorized under the Facility's stormwater or wastewater discharge permit.

If the Facility is unable to make the above certification, it is required to so notify DOE.

9.4.5 ALLOWABLE NON-STORMWATER DISCHARGES

There are no allowable non-stormwater discharges.

9.4.6 SALT STORAGE

There are no piles of salt at the Facility that are potentially exposed to stormwater.

9.4.7 EPCRA 313 CHEMICALS

The Facility has submitted Toxic Release Inventory Reports (TRI) reports for lead and chromium.

Lead is present in trace quantities in the sand used to manufacture the glass at the Facility. As described in Section 3.2.3, at no time is the sand exposed to precipitation. Iron chromite is a raw material used as a glass colorant and as described in Section 3.2.3, at no time is it exposed to precipitation.

Lead is present in the cullet, some of which is stored outside at the Facility, as described in Section 4.1. However, here the lead is effectively encapsulated in the glass and is thus protected from precipitation (see Section 3.2.3).

In summary, the chemicals for which the Facility submitted TRI reports are not exposed to precipitation.

9.5 BMPS FOR COMPLIANCE WITH THE INDUSTRIAL STORMWATER GENERAL PERMIT

The Stormwater Management Manual for Western Washington, February 2005 (Publication 05-10-32) and Condition S3 in the Stormwater Permit were used to prepare this SWPPP.

9.5.1 GENERAL OPERATIONAL BMPS

The BMPs practiced at the Facility for controlling pollutants in stormwater are summarized in Table 9-3 and described below:

- Formation of a Pollution Prevention Team (see Section 9.2)
- Good housekeeping
- Preventative maintenance
- Spill prevention and response procedures
- Facility inspections
- Employee training
- Reporting and recordkeeping
- Annual review of the SWPPP

Good Housekeeping

In addition to the measures describes in Section 3.2, the following BMPs apply:

- Promptly contain and clean up solid and liquid pollutant leaks and spills including oils, solvents, fuels, and dust from manufacturing operations on any exposed soil vegetation, or paved area.
- Sweep paved material handling and storage areas regularly as needed for the collection and disposal of dust and debris that could contaminate stormwater. Do not hose down pollutants from any area to the ground, storm drain, conveyance ditch, or receiving water.
- Clean oil, debris, sludge, etc. from all BMPs systems regularly, including catch basins and oil/ water separators to prevent the contamination of stormwater.
- Promptly repair or replace all substantially cracked or otherwise damaged paved secondary containment, high-intensity parking, and any other drainage areas, which are subject to pollutant material leaks or spills. Ensure areas are debris free.
- Promptly repair or replace all leaking connections, pipes, hoses, valves, etc., which can contaminate stormwater.
- Hazardous materials are to be handled as described in Section 3.2.5.

Preventative Maintenance

The inspection and monitoring program is described in Section 4.0. All areas are checked frequently for equipment that requires maintenance. Any equipment requiring maintenance is repaired within a time period that minimizes the risk of a release.

Preventative maintenance BMPs in place at the Facility include:

- Liquids are stored in steel and plastic drums that are rigid and durable, corrosion resistant to the weather and fluid content, non-absorbent, water tight, rodent-proof, and equipped with a close fitting cover.
- Materials that constitute a potential source of stormwater pollutant are stored inside a building or under a cover and/or containment.
- During oil and diesel transfers, all piping and hoses are checked to ensure they are properly connected. Worn gaskets, hoses, or corroded piping shall be repaired or replaced. Keep hoses out of traffic lanes, and ensure all valves are closed and hoses disconnected before tank trucks are moved.

Spill Prevention and Cleanup

See Sections 2.0 and 3.0.

Spill containment and cleanup kits are readily accessible and are stored in proximity to areas where there are potential fluid spills.

Immediately upon discovery, stop, contain, and clean up all spills.

If the spill has reached or may reach a sanitary storm sewer, groundwater, or surface water, notify DOE and the local sewer authority immediately.

Do not flush absorbent materials or other spill cleanup materials to a storm drain. Collect the contaminated absorbent material as a solid and place in appropriate disposal containers.

Employee Training on Maintaining and Implementing the SWPPP

The SWPPP training will be conducted in concurrence with the annual employee training described in Section 6.0. All employees that work in pollutant source area will receive training that includes:

- Identifying pollutant sources
- Understand pollutant control measures
- Spill prevention and response
- Good housekeeping
- Environmentally acceptable material handling/ management practices

Inspections and Recordkeeping

Visual inspections are conducted monthly as described in Section 4.0. The purpose of the visual inspection and periodic monitoring is to ensure that the stormwater pollutant controls (BMPs) being implemented are adequate and to determine whether there are unpermitted non-stormwater discharges to storm drains or receiving waters and either eliminate or obtain a permit for such a discharge.

The visual inspection reports and reports on spills of oil or hazardous substances in greater than RQs are kept on Site for a minimum of 5 years. The Facility also maintains records of related pollutant control such as training, quarterly sampling results, maintenance performed, etc.

9.5.2 SOURCE-SPECIFIC AND STRUCTURAL SOURCE CONTROL BMPS

The following source-specific BMPs apply to this Facility:

- Dust control at manufacturing areas
- Loading and unloading of liquid or solid material
- Maintenance and repair of vehicles and equipment
- Maintenance of stormwater drainage system
- Roof/building drains at manufacturing and commercial buildings
- Soil erosion and sediment control
- Spills of oil or hazardous substances
- Container storage of liquids or dangerous wastes
- Liquid storage in permanent aboveground tanks
- Outside storage or transfer of solid raw materials
- Washing and steam cleaning of vehicles/equipment/building structures

Dust Control

The following operational BMPs apply:

- Prevent dust generation and emissions where feasible. Sweep and clean up dust accumulation areas that can contaminate stormwater at least quarterly. Sweeping is conducted using vacuum filter equipment to minimize dust generation and to ensure optimal dust removal.
- Inspect and maintain cyclone separators, cloud chambers, and any other Facility particulate collection devices monthly to prevent the escape of dust from the system. Any accumulated dust will be immediately removed and properly disposed.

Loading and Unloading of Liquid or Solid Material

Loading and unloading of diesel fuel, lubricating oils, and used oils is described in Section 3.2.7. When loading or unloading these materials, the following operational BMPs apply:

- Sweep all loading/unloading area surfaces frequently.
- Place drip pans or other appropriate temporary containment at locations where leaks or spills may occur, such as, hose connections, hose reels, and filler nozzles. Drip pans shall always be used when making and breaking connections.
- Check loading/unloading equipment such as valves, pumps, flanges, and connections regularly for leaks and repair as needed.
- Do not lock shut-off fueling nozzles in the open position. Do not "top-off" tanks being refueled.
- During filling block, plug or cover storm drains that receive runoff from areas where filling.

The following structural and source-control BMPs apply:

- Loading and unloading is conducted under cover where practicable and in conformance with the Uniform Fire Code requirements.
- The edge of the property that is along the Duwamish shoreline has a curb and is sloped away from the shoreline to prevent direct stormwater runoff to the Waterway. The stormwater flows to an internal storm drain system that is monitored and has approved BMPs in place.

- The Facility is paved and sloped or bermed in the loading/unloading areas to prevent the pooling of water, prevent runoff of impacted stormwater to the stormwater system, and prevent runoff into the adjacent Duwamish Waterway.

Maintenance and Repair of Vehicles and Equipment

The following operational BMPs apply:

- Inspect for leaks all incoming vehicles, parts, and equipment stored temporarily outside.
- Use drip pans or containers under parts or vehicles that drip or that are likely to drop liquids, such as during dismantling of liquid containing parts or removal or transfer of liquids.
- Do not pour/convey washwater, liquid waste, or other pollutant into storm drains or to surface water.
- There are no drains inside the vehicle repair building. All spills are immediately contained and cleaned up.
- Inspect all equipment and vehicles for leaking fluids. Take leaking equipment and vehicles out of service or prevent leaks until repaired.

The following structural source control BMPs applies:

- Conduct all maintenance and repair of vehicles and equipment in a building

Maintenance of Stormwater Drainage and Treatment Systems

The stormwater drainage system consists of catch basins and conveyance piping. The catch basins require routine maintenance and cleaning to remove debris and sediments to allow for proper operation.

To maintain the stormwater drainage system, the following operations BMPs are in place:

- Inspect and clean catch basins as necessary and determine whether improvements in operations and maintenance are required.
- Promptly repair any deterioration threatening the structural integrity of the Facilities. These include replacement of catch basin lids, etc.

- Ensure that storm sewer capacities are not exceeded and that heavy sediment discharges to the sewer system are prevented.
- Regularly remove debris and material and dispose of appropriately. Catch basins shall be cleaned when the depth of sediment deposits reaches 60 percent of the sump depth measured from the bottom of the basin to the invert of the lowest pipe into or out of the basin. In no case should there be less than 6 inches clearance from the debris surface to the invert of the lowest pipe. Disposal of sediments must comply with DOE's Guidance document Publication WQ 99-09.

Roof/Building Drains at Manufacturing and Commercial Buildings

Roofing at the Facility consists of galvanized and three-tab composition roofing. All roof repairs are made with a material other than galvanized roofing. If leachates and/or emissions from buildings become suspected sources of stormwater pollutants, then a sample will be collected from the stormwater draining from the building.

Soil Erosion and Sediment Control at Industrial Sites

The Facility is located on the banks of the Duwamish Waterway. The Waterway is protected by a covering of riprap along the bank. The riprap serves to protect the integrity of the bank as well as stormwater drainage. The Site is 100 percent impervious, thus limiting any potential soil erosion.

Spills of Oils or Hazardous Substances

A, Spill Control and Response Plan, has been prepared for the Site and is included in Section 3.0 of the CESPP. In addition to the measures outlined in Section 3.0, the following BMPs also apply:

- Train key personnel in the implementation of the Emergency/Spill Response Procedures. Prepare a summary of the Plan and post it at appropriate points in the building, identifying the spill cleanup coordinators, location of cleanup kits, and phone numbers of regulatory agencies to be contacted in the event of a spill.

Container Storage of Liquids or Dangerous Wastes

The storage of totes and drums is described in Section 3.2.10 of the Spill control prevention procedures. The following operational BMPs are followed for container storage of all liquids or dangerous wastes:

- All containers shall have a tight-fitting lids and a label as specified by appropriate regulation.
- All mounted containers are placed over a large drip pan that also acts as secondary containment. Place drip pans at all potential drip and spill locations during filling and unloading of containers.
- All containers in use or open are placed over spill pallets.
- Container storage areas are inspected regularly for corrosion, structural failure, spills, leaks, overfills, and failure of piping systems. Check containers for leaks/spills. Replace containers and replace tighten bungs as needed.
- Dangerous and/or hazardous materials are labeled, handled, and stored in compliance with applicable regulations.
- Cover dumpsters to prevent the entry of stormwater. Replace or repair leaking garbage dumpsters.

The following structural BMPs are in place for container storage:

- All containers with potential pollutant liquids are stored inside a building over an impervious floor with no open floor drains that permits the collection of leaks and small spills
- All empty drums are stored in a designated outside area, which is covered, paved, and diked

Liquid Storage in Permanent Aboveground Tanks

The location, description, and spill prevention of the aboveground tanks and lines are described in the spill control prevention procedures Section 3.2.6. Aboveground storage tanks are subject to the following operational or structural BMPs:

- Inspected weekly to identify problem components such as fittings, pipe connections, and valves, and to identify leaks/spills, cracks, or corrosion.
- Replaced or repaired if leaking, corroded, or otherwise deteriorating.
- Located in impervious secondary containment. All secondary containment is of sufficient height to provide a containment volume of at least 110 percent of the volume of the tank. Table 3-1 describes the materials and dimensions of the secondary containment.

- Include a tank overfill protection system to minimize the risk of spillage during loading: A tandem team unloads the delivery truck consisting of the driver and operator and a member of the Facility personnel that monitors the filling process through a second port in each tank. The 7,000-gallon tank is equipped with a level.

Outside Storage or Transfer of Solid Raw Materials, By-Products, or Finished Products

Glass cullet is stored outside in various storage areas, described in Section 3.2.3. This material is not considered an erodible or water soluble material.

The following structural BMPs apply:

- The hot-end cullet is stored over impervious surfaces. The drainage from this area is directed to the oil-water separator
- Do not hose down any of the cullet stockpile areas to a storm drain

Washing and Steam Cleaning Vehicles/Equipment/Building Structures

Section 3.2.2 describes the degreasing operations conducted at the Facility. Degreasing operations are performed in the mold shop, maintenance shop, cold end maintenance shop, lift truck repair shop, and machine repair areas.

The following structural BMPs are in place:

- Outdoor steam cleaning of equipment containing oil residue is done over an impervious area in the location west of Tank 1, shown on Figure 1-2. No detergents are used. The washwater is conveyed to the oil-water separator.

9.5.3 TREATMENT BMPS

Based on a December 2007 and May and July 2011 sampling events, Level 2 responses (Permit condition S.4.c) were implemented to include the following applicable treatment BMPS:

- Sweeping of all outdoor areas on a weekly basis. Sweeping is conducted in the paved area adjacent to the Duwamish Waterway and along Ohio Avenue using

vacuum filter equipment to ensure optimal dust removal. Ohio Avenue is swept on a daily basis.

- Installation of catch basin filters and drain elbows on Ohio Avenue. The filters are inspected on a regular basis and replaced as needed.
- Catch basins are cleaned bi-monthly or when sediments reach levels described in Subsection 9.5.2 "Maintenance of Stormwater Drainage and Treatment Systems."

9.6 DOCUMENTATION REGARDING ENDANGERED SPECIES

A review of the information at <http://cfpub.epa.gov/npdes/stormwater/esa.cfm> shows that endangered species may be present in the vicinity of the Facility. However, as shown in Section 4.0 above, the stormwater discharge from the Facility is not impacted by the industrial activities at the Facility. Therefore, the stormwater from the Facility will not adversely affect any endangered species.

9.7 DOCUMENTATION REGARDING HISTORIC PROPERTIES

There are no historic places that are downstream and in the vicinity of the Facility. Consequently, there are no historic places that would potentially be impacted by discharges from the Facility.

9.8 ANNUAL REPORT

An Annual Report will be prepared and submitted to DOE no later than May 15 (except in 2010) of the following year. The Annual Report Form will be completed by a properly qualified person and is included in Appendix B.

The report will include all conditions identified for corrective action, a description of the problem, date of discovery, description of corrective action and implementation date and if corrective action is not complete, a date when it is expected to be completed.

If no observations of non-compliance are included in the report, the Facility will certify that it is in compliance with the SWPPP and the Stormwater Permit. The report and the compliance certification will be signed in accordance with Section 9.11.

The inspection of BMPs, outstanding, or implemented corrective actions will be conducted during a stormwater runoff event to ensure proper functioning.

If discharge locations are inaccessible, nearby downstream locations will be inspected.

9.9 MONITORING PLAN

The Plant Manager or his designee is responsible to ensure sampling and visual inspections are conducted.

9.9.1 VISUAL MONITORING

Visual inspections will be made and recorded monthly. During the quarterly sampling event, the sampling and visual inspections will be completed concurrently.

Monthly Observations: The Facility will perform visual inspections at each outfall monthly. The inspector will look for the presence of floating materials, visible sheen, discoloration, turbidity, odor, and any other abnormal characteristics. If present, then personnel will investigate the cause and implement corrective measures to reduce pollutants in the stormwater discharge. During monthly inspections the inspector will also determine the presence of any unauthorized non-stormwater discharges such as domestic wastewater, non-contact cooling water, or process wastewater. If a non-compliant discharge is discovered, the Facility will make the required notification to the DOE and eliminate the discharge within 30 days. The inspection will be documented on the Monthly Visual Inspection Form found in Appendix B. If no observations of non-compliance are included in the report, the Facility will certify that it is in compliance with the SWPPP and the Stormwater Permit. The inspector will sign the inspection form, which will be filed with this SWPPP and kept for 5 years.

9.9.2 BENCHMARK MONITORING

The Standard Industrial Classification Code (SIC) for the Facility is 3221, Glass Products. The Facility discharges its stormwater to the Duwamish Waterway, which is considered an impaired water, and to the sanitary sewer.

The Facility's Plant Manager is responsible for ensuring that quarterly samples are collected. Collection is the responsibility of a Stormwater Team member. A stormwater

sample is collected on a quarterly basis according to the permit sample collection criteria described below. If one or more of the criteria below cannot be met, a sample will be collected and an explanation will be included with the monitoring report. The explanation will identify what criteria were not met and the reason why. If the Facility is unable to sample during a monitoring quarter, the monitoring report will include an explanation. The Stormwater Permit does not require sampling outside of regular business hours or during unsafe conditions. The Facility will not collect samples during hours of darkness, during periods of lightening, or when in the best judgment of the Plant Manager or Plant Engineer, conditions are deemed unsafe for sample collection.

The Facility will make every effort to collect one quarterly sample according to the following storm event sample collection criteria:

1. The outfall locations, Outfalls 001-005 are identified on Figure 3-1. The designated sampling point is Outfall 002, which conveys the stormwater from Ohio Avenue, and represents 35 to 40 percent of the area of the Facility served by the storm sewer system. Based on similar activities and site conditions, this outfall is most representative of industrial stormwater discharge points from this Facility.
2. A single grab sample will be collected from the designated outfall to the Duwamish Waterway (Outfall 002). Visual observations will be performed at this location at the time of the sample collection. Visual observations will be performed at the other locations if the observations can be made safely. However, visual inspections must be made at least annually during a storm event at the locations not sampled.
3. One quarterly sample will be collected from the first fall storm event, after October 1st.
4. As appointed on the April 12, 2012 inspection, a sample will be taken at first flush no matter the period in which it may be taken, permitting safe conditions for sample collection.
5. All samples will be taken within the first 12 hours after discharge begins or as soon as possible after the first 12 hours; or if it is unknown (e.g., discharge was occurring start of regular business hours). Documentation will be kept on record explaining why samples could not be taken within first 12 hours.
6. Samples will be collected close to the point of discharge, at a location that is safe and practical.
7. The storm event must be at least 0.1 inches of rain in a 24-hour period.
8. The storm event sampled must be preceded by at least 24 hours of no greater than trace precipitation.

Specific stormwater sampling procedures are as follows:

1. Record the date and time of arrival, sample location, general Site conditions, and other applicable field observations related to the Site.
2. A notation describing if sample was collected within first 12 hours of a Stormwater discharge event; or if it is unknown (e.g., discharge was occurring start of regular business hours). An explanation of why a sample could not be taken within first 12 hours of a stormwater discharge event, if it was not possible. Or if it is unknown, an explanation of why the permittee doesn't know if a sample was collected within or outside the first 12 hours of Stormwater discharge. Record runoff quality with respect to color, turbidity, and odor.
3. Method of sampling, and method of sample preservation.
4. Sample jars are filled by collecting runoff directly into the jars held just below the point of exit from the drainage pipe.
5. Sample collection information and sample locations are recorded on the Chain of Custody (COC) form. The project name, location, station, date, and time of collection, number of containers, types of analysis, and sampler's signature and date will be included on the COC form. The COC will accompany the samples to the laboratory.
6. Seep samples collected each day will be stored and sealed in ice-filled coolers. Once a sample is collected, it should remain in the possession of the field sampling team until it is relinquished to the laboratory. COC seals will be placed on the cooler to ensure the cooler has not been tampered with.
7. The sampling results shall be submitted to DOE in accordance with the permit requirements including: all data in table below, date, project name, individual who performed the analysis, method detection limit, sample result, quality assurance/quality control data and using the Discharge Monitoring Report (DMR) included in Appendix B. DMRs will be submitted each quarter, even in quarters where sampling was not conducted and are due within 45 days of the end of each reporting period. Reports will be submitted to:

Department of Ecology
Water Quality Program - Industrial Stormwater
PO Box 47696
Olympia WA 98504-7696

The samples collected will be analyzed for the parameters shown in the table below and compared to the benchmark values. All meters used on Site will be used according to the manufacturer's requirements and properly calibrated. Samples will be sent to an accredited laboratory for analysis. An accredited lab may substitute equivalent or superior test methods. All lab reports will be maintained on site.

Parameter	Units	Analytical Method	Benchmark Value	Laboratory Quantitation Level	Minimum Sampling Frequency
Turbidity	NTU	Meter	25	0.5	Quarterly
pH	Standard Units	Meter or Litmus Paper	5-9	±0.5	Quarterly
Total Zinc	µg/L	EPA 200.8	117	2.5	Quarterly
Petroleum - Visible Oil Sheen	Yes/No	NA	No Visible Oil Sheen	NA	Quarterly
Total Copper	µg/L	EPA 200.8	14	2.0	Quarterly

Attainment of Benchmark Values: If the monitoring results are consistently below the benchmark values, then sampling may be suspended for one or more parameters (other than oil sheen). Consistent attainment is defined as eight (8) consecutive quarters where the results are less than the benchmark values, for quarters where sampling was conducted. *Any operational or procedural changes at the plant will require that sampling of all parameters listed above resume until attainment of benchmark values can be demonstrated.*

Response to Monitoring Results Above Benchmark Values: The requirements below apply to samples collected after December 31, 2004.

Level One Response and Corrective Action: Each time quarterly sampling results are above a benchmark value or outside the benchmark range for pH, the Facility will implement the following Level One Response:

1. Conduct a Facility inspection as soon as possible but no later than 14 days after receipt of the sampling results
2. The inspection will:
 - Evaluate possible sources of the exceeded benchmark parameter in the stormwater discharge
 - Identify source or operational control methods to further reduce stormwater contamination

- Evaluate whether any improvements or changes are needed to the SWPPP to control the benchmark parameter
3. Revise the SWPPP if necessary and recertify
 4. Implement the revised SWPPP as soon as possible but no later than the DMR due date for the quarter the benchmark was exceeded
 5. Summarize the Level 1 Corrective Actions in the Annual Report

Level Two Response and Corrective Action: Initiate a Level Two Response whenever any two quarterly sample results exceed a benchmark value (for a single parameter) in a given year.

1. Promptly identify the potential sources of stormwater contamination that are causing or contributing to the exceedance
2. Investigate all available options of source control, operational control, and stormwater treatment BMPs to reduce the contaminate levels below the benchmark values
3. Implement additional controls or BMPs identified during the investigation
4. Review and make appropriate revisions to the SWPPP and recertify
5. Implement the revised SWPPP as soon as possible but no later than August 31st the following year
6. If additional structural source control BMP are required but are not feasible by August 31st deadline or not feasible or necessary, DOE will be contacted for an extension of time or a waiver
7. Document all corrective actions in the Annual Report

Level Three Response: Initiate a Level Three Response whenever three quarterly sample results exceed a benchmark value (for a single parameter) in a given year.

1. Review and make appropriate revisions to the SWPPP, including additional Treatment BMPs and recertify. Revisions shall include the operational and/or structural source control for proper performance and maintenance of BMPs.
2. A site-specific engineering report containing requirements listed in the permit condition S8.D.3 must sent to the Department of Ecology for review listing all no later than May 15th, prior to the September 30th level three deadline. The plans, specifications and operation and maintenance manual must be sent 30 days prior to construction/installation.

3. Complete installation by September 30th the following year. A licensed professional engineer, geologist, hydrogeologist, or certified professional in storm water quality (CPSWQ) must design and stamp the portion of the SWPPP that addresses the stormwater treatment or processes.
4. If additional treatment BMPs are required but are not feasible by September 30th deadline or not feasible or necessary, DOE will be contacted for a extension of time or a waiver.
5. Document all corrective actions including monitoring, assessment and effectiveness and any determination if modified/enhances, or if new/additional treatment will be installed, in the Annual Report.

9.10 REPORTING OF UNAUTHORIZED RELEASES OR DISCHARGES

All unauthorized releases or discharges will be reported to the USEPA and the DOE within 30 days. However, if the release has the potential to endanger human health or the environment, it will be reported within 24 hours of the Facility becoming aware of it. In either case, the Facility will additionally provide the following information in a written submission within 5 days:

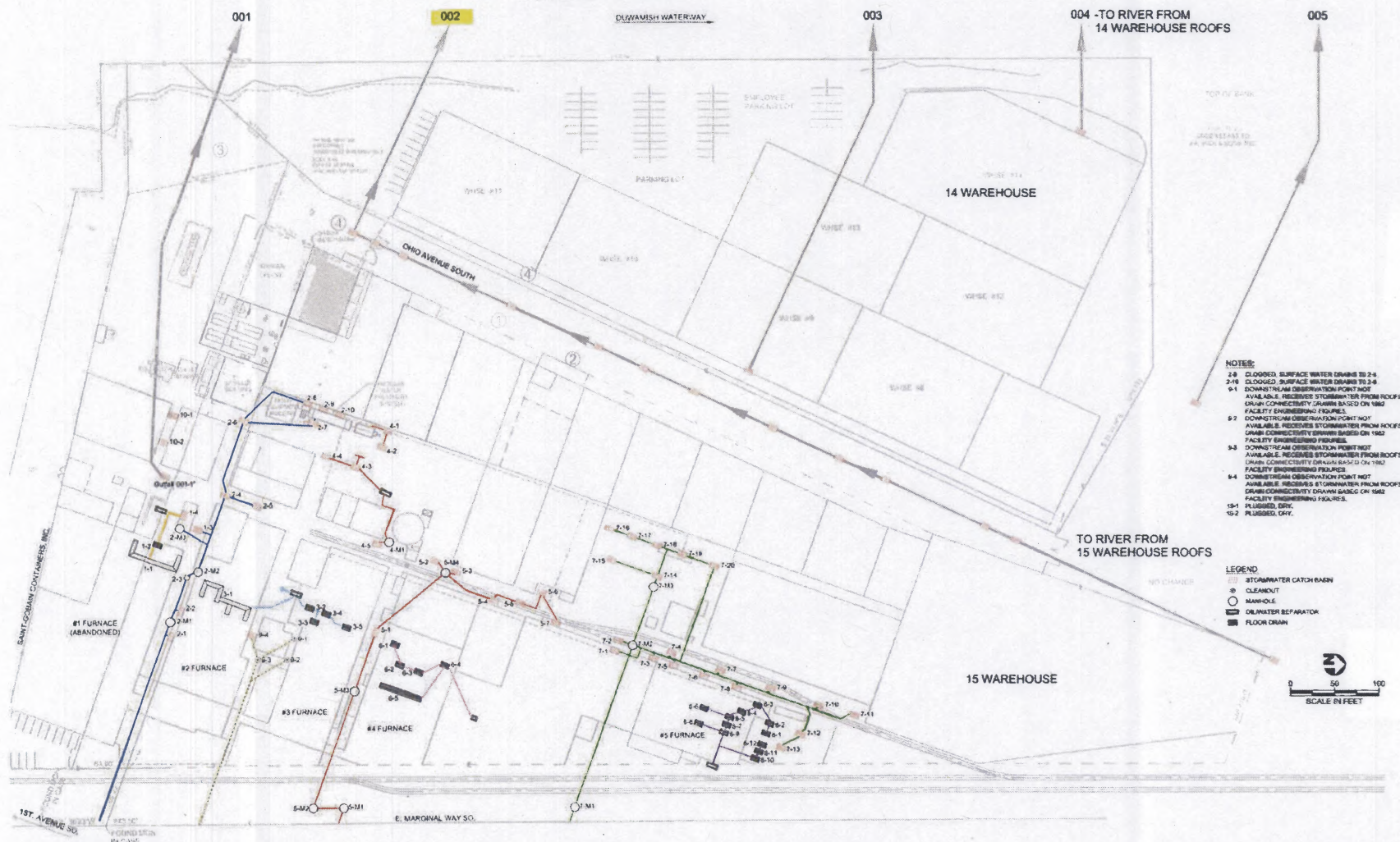
- A description of the release and its cause
- The date and time of the release, and how long it lasted
- If the release has not been stopped, the length of time it is expected to continue
- The steps taken, or planned, to stop the release, and to prevent its reoccurrence

The written submission will be made to the USEPA at:

USEPA Region 10
Office of Water OW-130, Stormwater Staff
1200 6th Avenue, Seattle, WA 98101

and to the DOE at:

DOE Northwest Regional Office
3190 - 160th Avenue SE
Bellevue, WA 98008-5452



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Storm and Floor Drain Connectivity
Saint-Gobain Containers, Inc.
Seattle, WA

TABLE 9-1

**POLLUTION PREVENTION TEAM MEMBERS AND RESPONSIBILITIES
SAINT-GOBAIN CONTAINERS, INC.
SEATTLE, WASHINGTON**

<i>Name or Title of Team Member</i>	<i>Office Phone Number</i>	<i>Responsibility</i>
Marlon Trigg	206-768-6221	Update the SWPPP as required in Section 9.1 of the CESPP.
Albertus Kariko	206-768-6275	Implement the preventative maintenance program for the Best Management Practices (BMPs) identified in Section 9.5 of the CESPP.
Jim Moretti	206-768-6276	Implement the employee training program described in Section 9.5 of the CESPP.
Jason Noble	206-768-6295	Conduct the routine Facility inspections described in Section 9.5 of the CESPP.
		Conduct the Comprehensive Site Compliance Evaluation (CSCE), and develop the CSCE Report as described in Section 9.8 of the CESPP.
		Conduct the monitoring activities and develop the records associated with those activities as described in Section 9.9 of the CESPP.

TABLE 9-2

**INVENTORY OF SOURCE MATERIALS
SAINT-GOBAIN CONTAINERS, INC.
SEATTLE, WASHINGTON**

Source Material/or Activity	Location	Quantity	Method of		Exposed Source?	Source Number*
			Storage	Handling		
Used Empty Containers-Uncleaned					No	
Machinery Storage					No	
Scrap Metal/Storage	Outside, Whse. #14, S. Ohio Street	1 to 4 tons 1 to 2 tons	Concrete pad	Fork lift	Yes	1 & 4
Trash Storage (rolloff, pile, etc.)	South End of Ohio St	2 - 40 cu ft 1- 40 cu ft 1- 20 cu ft	Open top Covered Roll off	Vendor Pick up	Yes	4
Aboveground Storage Tanks	As shown on Fig 2-1	--	--	--	Yes	See Table 3-1, Fig 2-1
Vehicle Fueling Area	Six locations, as shown on Fig 2-1	--	--	--	Yes	See Fig 2-1
Paint Storage Area					No	
Raw Material Unloading					No	
Cullet Pile	S.W. corner of Facility	4,000 tons	Concrete pad	Front end loader	Yes	3
Inventory Storage (drums, bags, etc.)					No	
Vehicle Maintenance/Staging Areas	East Side, Ohio Street	1 to 10 vehicles	Concrete pad	Driven	Yes	2
Wooden Pallets	East Side, Ohio Street	Approx. 2,000	Concrete pad	Fork lift	Yes	2
Dust Collector					No	
Cullet Crushing Conveyors					No	
Hot End Floor Sweepings					No	
Drum Storage					No	
Compressor Blowdown					No	
Vacuum Pumps					No	

* Source Number will correspond with Source Number on Figure 9-1 and in Table 9-3.

TABLE 9-3

IDENTIFICATION OF BEST MANAGEMENT PRACTICES
 SAINT-GOBAIN CONTAINERS, INC.
 SEATTLE, WASHINGTON

<i>Exposed Source from Table 9-2</i>	<i>Source Number</i>	<i>Potential Pollutants Associated with the Source</i>	<i>Description of Best Management Practices *</i>	<i>Inspection Schedule</i>
Scrap Metal Storage	1 & 4	Cutting and lubricating oil	Cover storages when not in use, plus good housekeeping and preventive maintenance	Weekly
Trash Storage	4	Miscellaneous	Cover storages when not in use, plus good housekeeping and preventive maintenance	Weekly
Cullet Piles	3	Lubricating oil from Hot End pile (the other piles are clean)	Discharge run-off from Hot End pile to the oil-water separator, plus good housekeeping and preventive maintenance	Weekly
Vehicle Maintenance	2	Lubricating oil, fuel	Good housekeeping and preventive maintenance	Weekly
Wooden Pallets	2	Miscellaneous	Good housekeeping and preventive maintenance	Weekly
Storage Tanks	See Fig 1-2	Oil	Secondary containment, good housekeeping and preventive maintenance	Weekly
Vehicle Fueling	See Fig 1-2	Fuel	Good housekeeping and preventive maintenance	Weekly

*Remove or Cover - 1st choice if possible, Good Housekeeping, Preventive Maintenance, Visual Inspections, Diversion of Stormwater, Non-Stormwater Discharges, Other

APPENDIX A

CERTIFICATIONS, APPROVALS, AND RECORDS OF REVISIONS

CERTIFICATION OF SPCC PLAN PORTION OF CESPP
STATEMENT OF MANAGEMENT APPROVAL FOR SPCC PLAN
STATEMENT OF MANAGEMENT APPROVAL FOR SWPPP PLAN
CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA
RECORD OF REVIEWS AND AMENDMENTS FOR SPCC PLAN
CERTIFICATION OF NON-STORMWATER DISCHARGES

**STATEMENT OF MANAGEMENT APPROVAL
SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PORTION OF THE
CONTINGENCY, EMERGENCY AND SPILL PREVENTION PLAN
SAINT-GOBAIN CONTAINERS, INC. FACILITY
SEATTLE, WASHINGTON**

As a member of the management of the Saint-Gobain Containers, Inc. facility (Facility), located at 5801 East Marginal Way South, Seattle, Washington 98134, with the authority to commit the necessary resources to fully implement the SPCC portion of this Contingency, Emergency and Spill Prevention Plan (Plan), I hereby fully approve of the Plan and commit the necessary resources to fully implement it.

Signature: _____

Douglas N. Coburn

Name: _____

DOUGLAS N. COBURN

Title: _____

PLANT MANAGER

Date: _____

JULY 9, 2012

CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

Facility Name: Saint-Gobain Containers, Inc.

Facility Address: 5801 East Marginal Way South, Seattle, Washington 98134

1. Does the Facility transfer oil over water to or from vessels, and does the Facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ☐ No ☒
2. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons, and does the Facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes ☐ No ☒
3. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons, and is the Facility located at a distance such that a discharge from the Facility could cause injury to fish and wildlife and sensitive environments?
Yes ☐ No ☒
4. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons, and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the Facility would shut down a public drinking water intake?
Yes ☐ No ☒
5. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons, and has the Facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ☐ No ☒

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____

Name (please type or print):

Title:

Date:

DOUGLAS N. COBURN

PLANT MANAGER

JULY 9, 2012

**STATEMENT OF MANAGEMENT APPROVAL
STORMWATER POLLUTION PREVENTION PLAN (SWPPP) PORTION OF THE
CONTINGENCY, EMERGENCY, AND SPILL PREVENTION PLAN
SAINT-GOBAIN CONTAINERS, INC. FACILITY
SEATTLE, WASHINGTON**

As a member of the management of the Saint-Gobain Containers, Inc. facility (Facility), located at 5801 East Marginal Way South, Seattle, Washington 98134, with the authority to commit the necessary resources to fully implement the SWPPP portion of this Contingency, Emergency And Spill Prevention Plan (Plan), I hereby fully approve of the Plan and commit the necessary resources to fully implement it.

Each time a Level 1, 2, or 3 Corrective Action is required, this form will be re-signed and re-certified by the Permittee, and attached to the SWPPP.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information to determine compliance with the Industrial Stormwater General Permit. Based on my inquiry of the person or persons who are responsible for stormwater management at my Facility, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete, and in full compliance with Permit Conditions S3 and S8, including the Correct Best Management Practices from the applicable Stormwater Management Manual. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Is this SWPPP Certification in response to a Level 1, 2, or 3 Corrective Action?

Yes ☐
No ☐

If Yes: Type of Corrective Action? ☐ Level 1 ☐ Level 2 ☐ Level 3

Signature: _____

Douglas N. Coburn

Name: _____

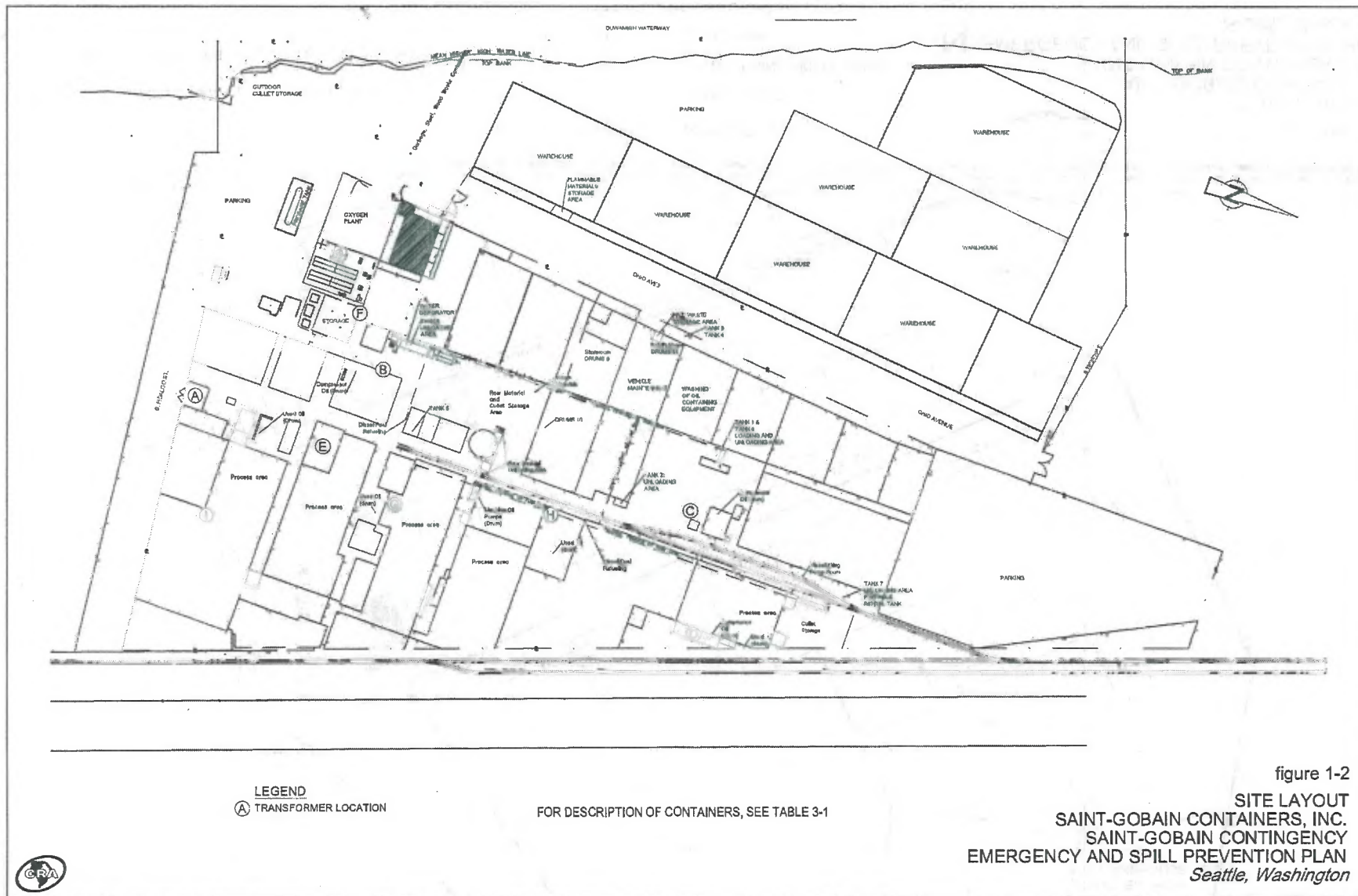
DOUGLAS N. COBURN

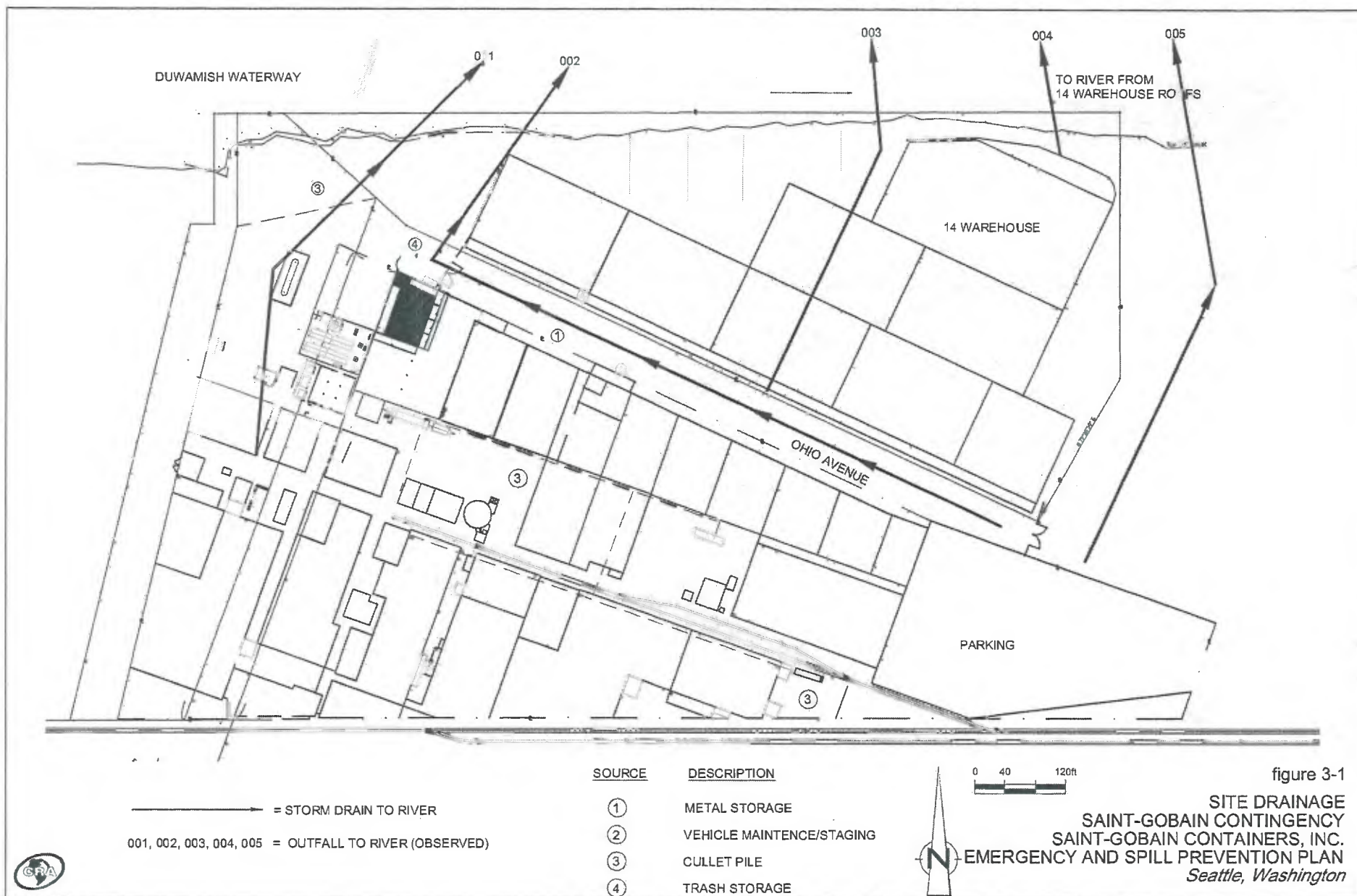
Title: _____

Plant Manager

Date: _____

7/13/12







AREA	DESCRIPTION
①	INDUSTRIAL PROCESS AREA
②	DEGREASING OPERATIONS
③	INVENTORY STORAGE AREAS
④	INVENTORY USAGE
⑤	HAZARDOUS WASTE STORAGE AREAS

FOR DESCRIPTION OF AREAS, SEE SECTION 3-2

figure 3-2
 AREAS OF INDUSTRIAL ACTIVITY
 SAINT-GOBAIN CONTAINERS, INC.
 SAINT-GOBAIN CONTINGENCY
 EMERGENCY AND SPILL PREVENTION PLAN
 Seattle, Washington

